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12 Gallant Capital Partners, LLC

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

15 EI CORPORATION, INC., a Nevada  
corporation.

CASE NO. 2:20-cv-01119-APG-NJK

Hon. Andrew P. Gordon

**DEFENDANT GALLANT CAPITAL  
PARTNERS, LLC'S JOINDER TO  
MOTION TO TRANSFER VENUE**

Complaint Filed: June 24, 2020

17

VS

GALLANT CAPITAL PARTNERS, LLC, a Delaware limited liability company; QUALITY BUILT, LLC, a Delaware limited liability company; and JOHN GILLETT, an individual,

### Defendants.

1           Defendant Gallant Capital Partners, LLC (“Gallant”) joins in the motion to  
 2 transfer venue pursuant to 28 U.S.C. § 1404(A) filed by defendant Quality Built,  
 3 LLC (ECF No. 22, the “Motion”) for all reasons stated therein.

4           In support of the Motion and this Joinder, Gallant notes that Gallant’s  
 5 principal place of business is in Los Angeles, California. (Compl. at ¶ 6.) The  
 6 allegations regarding Gallant center around the Confidentiality and Nondisclosure  
 7 Agreement (the “NDA”) entered into between Gallant and Plaintiff for the purpose  
 8 of exchanging documents and information in connection with a potential  
 9 transaction. (Compl. at Ex. 2.) Pursuant to the NDA, Plaintiff shared documents  
 10 with Gallant. (Compl. at ¶ 29.) Plaintiff has placed those documents at issue in  
 11 this case, and the documents and information relevant to the allegations against  
 12 Gallant, as well as the relevant witnesses, are located in California.

13           Moreover, the NDA is governed by Delaware law. (Compl. at Ex. 2.)  
 14 Therefore, Nevada has no greater interest than California in enforcing the terms of  
 15 the NDA.

16           Because the relevant documents, information, and witnesses are located in  
 17 California, Gallant joins the Motion and requests that this action be transferred to  
 18 the Southern District of California, or in the alternative, the Central District of  
 19 California.

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21 DATED: July 23, 2020

McDONALD CARANO LLP

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By: /s/ Katie Beaudin

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23

and

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KATIE BEAUDIN,  
*(Admitted pro hac vice)*

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JOINDER TO MOTION TO TRANSFER VENUE

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11 Attorneys for Defendant  
12 Quality Built, LLC  
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